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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ILLUMINA, INC. and
ILLUMINA CAMBRIDGE LTD.,

Plaintiffs,

v.

BGI GENOMICS CO., LTD.,
BGI AMERICAS CORP.,
MGI TECH CO., LTD.,
MGI AMERICAS INC., and
COMPLETE GENOMICS INC.,

Defendants.

Case No.: 3:19-cv-03770-WHO
Case No.: 3:20-cv-01465-WHO

**DECLARATION OF HONGLIN ZHAO
IN SUPPORT OF DEFENDANTS'
OPPOSITION TO ILLUMINA'S
MOTION FOR PRELIMINARY
INJUNCTION**

**CONTAINS OUTSIDE ATTORNEYS'
EYES ONLY INFORMATION**

1 I, Honglin Zhao, declare as follows:

2 1. I have personal knowledge of the facts stated herein. I could and would testify that
3 the following facts are true and correct, to the best of my knowledge, if called upon to do so.

4 2. I am currently employed by Complete Genomics Inc. ("CGI") as a Director of
5 Human Resources ("HR"). My responsibilities include recruitment, compensation and benefits,
6 training, performance management, immigration, and functioning as an HR business partner with
7 CGI affiliated companies, including MGI Americas Inc. ("MGI Americas"), BGI Research, BGI
8 Americas, EGI and MGI Canada.

9 3. I have been employed by CGI since August 2017. Prior to that, and over a period
10 of six and a half years (*i.e.*, from 2011 to 2017), I was a Manager, and then Director, of Human
11 Resources for BGI Americas Corp. I served in various roles within Human Resources, including
12 recruiting and talent retention, managing employee training, setting up HR policies, and
13 overseeing company reorganizations.

14 4. For purposes of the present litigation, I have been asked to estimate the number of
15 employees that CGI and MGI Americas would have to lay off if the Court enters an injunction
16 preventing Defendants from using its sequencers in the United States for purposes of research and
17 development and preventing MGI Americas from commercially launching its sequencers in the
18 United States, at least until the conclusion of the litigation. In consultation with company
19 executives, I have estimated that at least 54 employees would be laid off from CGI and MGI
20 Americas. These employees would include: (1) approximately 90% of the researchers, scientists,
21 and analysts in CGI's San Jose-based R&D and biochemistry teams; (2) a portion of MGI
22 Americas' sales force, marketing, admin, and business development teams; and (3) approximately
23 60% of CGI's administrative team, including HR, finance, supply chain, and IT employees.
24 Nearly all of these employees are based in CGI and MGI Americas' San Jose facilities.
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7. Even if CGI and MGI Americas could find qualified candidates to replace employees that had been laid off, it would be extremely expensive and time consuming to train them. Indeed, if an injunction were entered and later lifted or vacated, it would take CGI and MGI Americas months to hire and train new employees to support the launch of MGI Americas' sequencers.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Strongli

HONGLIN ZHAO